

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO.
	: 1:01-CR-131
v.	:
	:
SYNEDO MICHAEL WILLIAMS	: (Judge Rambo)
	: Electronically Filed

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE OBJECTIONS TO PRE-SENTENCE REPORT**

**AND NOW**, this 4<sup>th</sup> day of May, 2007, comes the above-captioned Defendant, Synedo Michael Williams, by and through his counsel, Robert J. Daniels, Esquire, and respectfully requests this Honorable Court grant an extension of time in the above-captioned matter, and in furtherance thereof avers the following:

1. Objections to the Pre-Sentence Report in the above-captioned matter are due by May 4, 2007.
2. The Defendant currently resides in Ontario, Canada.
3. Counsel and Defendant are still attempting to schedule a face to face meeting and have not had the opportunity to review the Pre-Sentence Report. A meeting has been tentatively scheduled by undersigned counsel within the next week.
4. The Pre-Sentence Report is an expansive document that includes references to several dozen persons and involves a sophisticated criminal enterprise. While

undersigned counsel has reviewed the Pre-Sentence Report, there are remaining issues that must be researched, investigated and reviewed with the Defendant.

5. Accordingly, additional time is needed.

6. Counsel for Defendant spoke with Assistant U.S. Attorney Christy Fawcett, and Attorney Fawcett concurs with this request.

**WHEREFORE**, it is respectfully requested that a fifteen (15) day extension of time be granted to respond to the Pre-Sentence Report in the above-captioned matter.

Respectfully submitted,

KILLIAN & GEPHART, LLP

Dated: May 4, 2007

s/ Robert J. Daniels

Robert J. Daniels, Esquire  
Attorney I.D. #83376  
218 Pine Street  
P. O. Box 886  
Harrisburg, PA 17108-0886  
(717) 232-1851

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**CERTIFICATE OF CONCURRENCE**

The undersigned has contacted Assistant U.S. Attorney Christy Fawcett, who has indicated that she concurs in this Motion For Extension Of Time.

Respectfully submitted,

KILLIAN & GEPHART, LLP

Dated: May 4, 2007

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s/Robert J. Daniels  
Robert J. Daniels, Esquire  
Attorney I.D. #83376  
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**CERTIFICATE OF SERVICE**

I, Robert J. Daniels, of the law firm of Killian & Gephart, do hereby certify that I forwarded a true and correct copy of the attached Unopposed Motion For Extension Of Time by the Middle District Court's Electronic Filing System on May 4, 2007, to the following:

Christy Fawcett, Esquire  
Assistant U.S. Attorney  
U.S. Department of Justice  
228 Walnut Street, Suite 220  
P.O. Box 11754  
Harrisburg, PA 17108-1754

Respectfully submitted,

Dated: May 4, 2007

/s/ Robert J. Daniels

Robert J. Daniels, Esquire  
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218 Pine Street  
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